

Perkins Coie LLP
Rule 37 Attorneys' Fees

Exhibit A

DATE	TIMEKEEPER	ROLE	TIME	RATE	AMOUNT BILLED	DESCRIPTION
2/21/2021	Smith, Dawn K.	Senior Paralegal	1.3	\$210.00	\$273.00	Review Plaintiff Jane Doe and A. Heppner's written discovery responses and notate deficiencies in preparation for meet and confer draft.
2/24/2021	Schirack, Sarah L.	Counsel	1.6	\$400.00	\$640.00	Begin drafting meet and confer letter regarding inadequate discovery responses and review discovery responses to support same.
2/24/2021	Smith, Dawn K.	Senior Paralegal	0.3	\$210.00	\$63.00	Conference regarding discovery responses of Plaintiffs, draft meet and confer letter to Plaintiffs, and other next steps.
3/1/2021	Schirack, Sarah L.	Counsel	0.8	\$380.00	\$304.00	Continue drafting meet and confer letter and reviewing discovery responses to support same.
3/9/2021	Schirack, Sarah L.	Counsel	1.1	\$380.00	\$418.00	Continue reviewing Plaintiffs' discovery responses and drafting meet and confer letter based on same.
3/11/2021	Schirack, Sarah L.	Counsel	3.2	\$380.00	\$1,216.00	Finish reviewing all six Plaintiffs' discovery responses and drafting meet and confer letter regarding inadequacies in same (2.9); conference with D. Smith regarding same (.3).
3/11/2021	Smith, Dawn K.	Senior Paralegal	0.8	\$225.00	\$180.00	Westlaw research regarding request for releases and Plaintiffs' objections to same.
3/12/2021	Smith, Dawn K.	Senior Paralegal	0.4	\$225.00	\$90.00	Revise draft meet and confer letter to Plaintiffs' counsel regarding insufficient written discovery responses;
3/15/2021	Schirack, Sarah L.	Counsel	0.2	\$380.00	\$76.00	Revise meet and confer letter and send same;
4/9/2021	Schirack, Sarah L.	Counsel	0.2	\$380.00	\$76.00	Conference with P. Desai about potential motion to compel.
4/11/2021	Ryman, Danielle M.	Partner	0.5	\$435.00	\$217.50	Review Plaintiffs' objections to University discovery and direct associate on case law supporting disclosure.

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DATE	TIMEKEEPER	ROLE	TIME	RATE	AMOUNT BILLED	DESCRIPTION
4/11/2021	Schirack, Sarah L.	Counsel	0.1	\$380.00	\$38.00	Conference with D. Ryman and P. Desai regarding potential motion to compel.
4/13/2021	Desai, Priyam	Associate	1	\$300.00	\$300.00	Research discovery rules for medical records to respond to Plaintiffs' counsel.
4/14/2021	Desai, Priyam	Associate	1.2	\$300.00	\$360.00	Research discovery rules for medical records to respond to plaintiffs' counsel.
5/7/2021	Ryman, Danielle M.	Partner	1.4	\$435.00	\$609.00	Confer with team regarding emotional distress damages and distinction between garden variety emotional distress.
5/7/2021	Schirack, Sarah L.	Counsel	2.6	\$380.00	\$988.00	Review and annotate deficiencies in Plaintiffs' supplemental discovery responses (1.2); research and distinguish Plaintiffs' claims regarding emotional distress from "garden variety" claims under Alaska law (.7); draft email to Plaintiffs' counsel regarding legal inadequacy of supplemental discovery responses (.7).
5/27/2021	Schirack, Sarah L.	Counsel	1.2	\$380.00	\$456.00	Review meet and confer correspondence and responses from Plaintiffs' counsel regarding same and outline motion to compel based on same.
5/28/2021	Desai, Priyam	Associate	3	\$300.00	\$900.00	Draft motion to compel, memorandum, and proposed order.
6/1/2021	Desai, Priyam	Associate	3.5	\$300.00	\$1,050.00	Continue drafting motion to compel, memorandum, and proposed order.
6/2/2021	Desai, Priyam	Associate	2.1	\$300.00	\$630.00	Continue drafting motion to compel, memorandum in support, proposed order, and affidavit.
6/2/2021	Schirack, Sarah L.	Counsel	3.8	\$380.00	\$1,444.00	Revise motion to compel and conference with P. Desai regarding same and review communications between parties to support same.

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Rule 37 Attorneys' Fees

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DATE	TIMEKEEPER	ROLE	TIME	RATE	AMOUNT BILLED	DESCRIPTION
6/3/2021	Schirack, Sarah L.	Counsel	0.4	\$380.00	\$152.00	Finish revisions to motion to compel and conference with P. Desai regarding same.
6/7/2021	Desai, Priyam	Associate	2.5	\$300.00	\$750.00	Revise motion to compel based on feedback from S. Schirack.
6/8/2021	Desai, Priyam	Associate	4	\$300.00	\$1,200.00	Continue revisions to motion to compel based on feedback from S. Schirack and research additional caselaw for motion to compel.
6/8/2021	Ryman, Danielle M.	Partner	2.3	\$435.00	\$1,000.50	Direct associate regarding discovery responses and outline motion to compel.
6/8/2021	Schirack, Sarah L.	Counsel	0.5	\$380.00	\$190.00	Conference with D. Ryman regarding discovery dispute and motion to compel (.2); conference with P. Desai regarding motion to compel and revisions to same (.2); conference with opposing counsel regarding discovery dispute (.1).
6/9/2021	Desai, Priyam	Associate	2.5	\$300.00	\$750.00	Continue revisions to motion to compel based on feedback from S. Schirack and research additional caselaw for motion.
6/23/2021	Schirack, Sarah L.	Counsel	1.8	\$380.00	\$684.00	Revise motion to compel and review discovery produced to date from Plaintiffs to address same in motion.
6/24/2021	Schirack, Sarah L.	Counsel	2.6	\$380.00	\$988.00	Finish revising motion to compel and reviewing discovery produced to date from Plaintiffs to address same in motion; research case law to support motion and incorporate into same.
6/28/2021	Schirack, Sarah L.	Counsel	0.2	\$380.00	\$76.00	Conference regarding proposed exhibits in support of motion to compel and review same.
6/28/2021	Smith, Dawn K.	Senior Paralegal	0.3	\$225.00	\$67.50	Revisions to motion to compel.

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Rule 37 Attorneys' Fees

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DATE	TIMEKEEPER	ROLE	TIME	RATE	AMOUNT BILLED	DESCRIPTION
6/30/2021	Ryman, Danielle M.	Partner	1.3	\$435.00	\$565.50	Review and revise motion to compel and direct associate regarding client review and approval and inclusion of psychiatric report.
7/8/2021	Schirack, Sarah L.	Counsel	1.2	\$380.00	\$456.00	Coordinate exhibits for motion to compel and revise motion and send client draft of motion package and revise proposed order for same (.8); review supplemental discovery responses to ensure that motion to compel addresses all of our needs (.4).
7/9/2021	Schirack, Sarah L.	Counsel	0.3	\$380.00	\$114.00	Finalize and file motion to compel.
8/2/2021	Schirack, Sarah L.	Counsel	0.7	\$380.00	\$266.00	Draft opposition to motion to extend deadline for Plaintiffs to respond to the University's motion to compel and analyze ripple-effects on current case schedule and strategize regarding same.
8/17/2021	Schirack, Sarah L.	Counsel	1.4	\$380.00	\$532.00	Review Plaintiffs' opposition to motion to compel and begin outlining reply and conference with team regarding strategy for same.

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DATE	TIMEKEEPER	ROLE	TIME	RATE	AMOUNT BILLED	DESCRIPTION
8/18/2021	Schirack, Sarah L.	Counsel	5.2	\$380.00	\$1,976.00	Review Plaintiffs' diagnostic evaluations and weave together narrative for legal argument section of reply in support of motion to compel to show that almost all of the Plaintiffs have had previous traumas that could conceivably be responsible for the injuries and damages they allege as part of this suit, as justification for the University's requested discovery (2.4); conference with D. Smith regarding reply in support of motion to compel and potential exhibits and information to support same (.2); research whether court can compel Plaintiffs' to provide medical releases and whether Plaintiffs have waived physician-patient privilege by putting their severe mental anguish at issue and outline and draft legal argument section in reply regarding same (2.6).
8/18/2021	Smith, Dawn K.	Senior Paralegal	0.4	\$225.00	\$90.00	Research related to Plaintiff's relevance objection to request for medical records.
8/19/2021	Schirack, Sarah L.	Counsel	3.6	\$380.00	\$1,368.00	Outline, research for, and draft legal argument sections in reply in support of motion to compel regarding what precisely Plaintiffs have produced to date and why their objections are legally inadequate given the claims at issue and why Plaintiffs' proffer of depositions and expert reports is inadequate to remedy their discovery production deficiencies (3.4); conference with D. Smith regarding Plaintiffs' discovery production to date (.2).

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DATE	TIMEKEEPER	ROLE	TIME	RATE	AMOUNT BILLED	DESCRIPTION
8/19/2021	Smith, Dawn K.	Senior Paralegal	1.9	\$225.00	\$427.50	Summarize substantive discovery responses to ensure validity of assertions in reply in support of motion to compel regarding deficiencies in discovery responses;
8/19/2021	Smith, Dawn K.	Senior Paralegal	1.1	\$225.00	\$247.50	Draft time line and details of subpoenas issued by Plaintiffs in March 2020 for medical and mental health records in preparation for drafting reply to opposition to motion to compel.
8/19/2021	Smith, Dawn K.	Senior Paralegal	1.4	\$225.00	\$315.00	Draft table detailing all production received to date for purposes of reply to opposition to motion to compel.
8/20/2021	Schirack, Sarah L.	Counsel	2.9	\$380.00	\$1,102.00	Cross-check all discovery produced by Plaintiffs to date to bolster our assertions about Plaintiffs' lacking discovery to date in reply in support of motion to compel (1.8); comprehensive review of and revisions to same and draft introduction and conclusion to same (.9); coordinate exhibits for same (.2).
8/20/2021	Smith, Dawn K.	Senior Paralegal	0.4	\$225.00	\$90.00	Confirm proposed redactions of exhibits to accompany Reply to Motion to Compel.
8/20/2021	Smith, Dawn K.	Senior Paralegal	1.2	\$225.00	\$270.00	Prepare summary of all substantive responses provided by Plaintiffs to D. Yesner's interrogatories and requests for production to ensure that none are response to the University's discovery requests;
8/23/2021	Schirack, Sarah L.	Counsel	0.5	\$380.00	\$190.00	Revise and finalize reply in support of motion to compel for filing;
	TOTAL		70.9		\$24,196.00	